

**IN THE DRAWINGS**

Applicants enclose Replacement Sheets for Figs. 1A - 7. Please add the caption "Prior Art" to Figs. 1A - 7.

**REMARKS**

Claims 1-14 are pending in the above-referenced patent application. Claims 7-13 have been withdrawn from consideration, and Applicants reserve the right to file one or more divisional applications directed to these claims.

The Examiner objected to Figs. 1A – 7 in the drawings under MPEP § 608.02(g) for failing to designate that which is old as “Prior Art.” Applicants enclose replacement sheets for Figs. 1A – 7 with the designation “Prior Art.” Accordingly, Applicants respectfully request that the Examiner withdraw the objection.

Claims 1-6 and 14 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,888,803 to Gentry et al. Applicants respectfully traverse the Examiner’s rejection.

Applicants respectfully submit that the Examiner’s application of Gentry et al. was improper. For example, the Examiner relied upon the description in Gentry et al. of a connection from a base station controller (“BSC”) 210 through a BSC gateway (“BGW”) 200 and an IP network 100 to an end office telephony switch (“EOTS”) gateway (“EOGW”) 300, as illustrated in Fig. 2 of Gentry et al., as alleged disclosure of the claimed “connecting a line-switching exchanger and a network-gateway using a radio-base-station-connection line that is used for connecting radio base stations.” Gentry et al. do not disclose, however, IP network 100, BGW 200, and EOGW 300 forming a “radio-base-station-connection line that is used for connecting radio base stations.” Gentry et al., therefore, do not disclose a radio-base-station-connection line, which is used for connecting radio base stations, connecting a line-switching exchanger and a network gateway, as claimed.

Furthermore, the Examiner pointed to Fig. 4 of Gentry et al. as an illustration of registering a mobile device, and applied the description of EOGW 300 and EOTS 310 as alleged

disclosure of the claimed line-switching exchanger and database. But Fig. 4 of Gentry et al. merely illustrate a mobile device registration via BGW 200 to mobility gatekeeper (“GK”) 500 and, correspondingly, home location register (“HLR”) 520. Col. 8, lines 19-59 of Gentry et al. In other words, the registration illustrated in Fig. 4 of Gentry et al. does not involve any device registering with any database in either EOGW 300 or EOTS 310. And thus, Gentry et al., as cited and applied by the Examiner, do not disclose the claimed features of “a line-switching exchanger including a database...and registering said IP terminal device as a radiotelephony device in said database.”

Additionally, the Examiner contended that cellular network 510 may include a mobile device that would be connected to BGW 200 via IP network 100 through GK 500 in Gentry et al., which would allegedly disclose the claimed network-gateway device being connected to the IP terminal device through an IP network. The Examiner has failed to cite, however, any portion in Gentry et al. that describes BGW 200 servicing any mobile device in cellular network 510 other than mobiles 220 via BSC 210.

Therefore, Gentry et al., as cited and relied upon by the Examiner, fail to disclose,

“[a] method of registering an IP (Internet Protocol) terminal device including a function to transmit and receive IP packets, to a line-switching exchanger including a database that is used for managing a type of a telephone set and a telephone number thereof, said method comprising the steps of:  
connecting said line-switching exchanger and a network-gateway device by use of a radio-base-station-connection line that is used for connecting radio base stations;  
connecting said network-gateway device and said IP terminal device through an IP network; and  
registering said IP terminal device as a radiotelephony device in said database,” as recited in claim 1. (Emphasis added)

Again, the claimed invention provides for treating, registering, and managing a voice over IP ("VoIP") terminal device as if it were a radio mobile terminal device that is connected to a radio-base-station-connection interface of a PBX. Advantageously, supplementary service functions of the PBX may be used, and a change in connection of the VoIP terminal device may be affected by simply changing the data registration to the PBX without requiring a change in the data registration to the gatekeeper device.

Accordingly, Applicants respectfully submit that claim 1, together with claims 2 and 14 dependent therefrom, is patentable over Gentry et al. for at least the above-stated reasons. Claim 3 includes features similar to those of claim 1 cited above and is, therefore, together with claims 4-6 dependent therefrom, patentable over Gentry et al. for at least the same reasons.

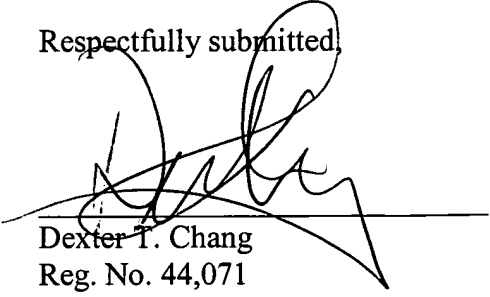
The above statements on the disclosures in the cited references represent the present opinions of the undersigned attorney. The Examiner is respectfully requested to specifically indicate those portions of the respective reference that provide the basis for a view contrary to any of the above-stated opinions.

Applicants appreciate the Examiner's implicit finding that the additional U.S. patents made of record, but not applied, do not render the claims of the present application unpatentable, whether these references are considered alone or in combination with others.

In view of the remarks set forth above, this application is in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Respectfully submitted,



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